IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	Criminal No. 23-
v.)	(16 U.S.C. § 668(a))
RODNEY THOMAS)	

INDICTMENT

COUNT ONE

The grand jury charges:

On or about May 12, 2023, in the Western District of Pennsylvania, the defendant, RODNEY THOMAS, without the permission of the Secretary of the Interior, did knowingly or with wanton disregard for the consequences of his act, unlawfully take a bald eagle, Haliaeetus leucocephalus, commonly known as the American bald eagle, that is, by shooting and killing it with an air rifle, in Mount Pleasant Township, Pennsylvania.

In violation of Title 16, United States Code, Section 668(a).

FILED

JUL 18 2023

CLERK U.S. DISTRICT COURT WEST, DIST, OF PENINSYLVANIA

FORFEITURE

The United States hereby gives notice to the defendant charged in Count One and that upon his conviction of such offense, the government will seek forfeiture in accordance with Title 16, United States Code, Section 668b(b), which requires any person convicted of this offense to forfeit to the United States of America any and all bald eagles taken contrary to the provisions of Title 16, Chapter 5A, Subchapter II, and all guns, traps, nets, and other equipment, vehicles, and other means of transportation used to aid in the taking of any bird in violation of said subchapter.

A True Bill,

FOREPERSON

ERIC G. OLSHAN United States Attorney IL ID No. 6290382

NICOLE A. STOCKEY

Assistant United States Attorney

PA ID No. 306955